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State of North Carolina
Department of Environment, Health, and Natural Resources
512 North Salisbury Street • Raleigh, North Carolina 27604-1148

James B. Hunt, Jr., Governor

Division of Solid Waste Management

Jonathan B. Howes, Secretary

Telephone 919-733-2801
August 11, 1993

RETURN RECEIPT REQUESTED

Commander, Atlantic Division
Naval Facilities Engineering Command
Code 1822

Attention: MCB Camp Lejeune, RPM
Ms. Linda Berry, P.E.
Norfolk, Virginia 23511-6287

Commanding General
Attention: AC/S, Environmental Management
Building 1, Marine Corps Base
Camp Lejeune, NC 28542-5001

RE: Draft Record of Decision and Proposed Remedial Action
Plan for Operable Unit #2, Sites 6, 9, and 82
MCB Camp Lejeune

Dear Ms. Berry:

Attached please find the NC Superfund Section comments to the referenced documents. If you have any questions please contact me at (919) 733-2801. Additional comments are being prepared by the NC DEM Groundwater Section and will be forthcoming.

Sincerely,

A handwritten signature in cursive script that reads "E. Peter Burger, for".

E. Peter Burger, P.E.
Environmental Engineer
NC Superfund Section

cc: Michelle Glenn, US EPA
Neal Paul, MCB Camp Lejeune
Richard Schiever, NC DEM, Wilmington, NC

P.O. Box 27687, Raleigh, North Carolina 27611-7687 Telephone 919-733-4984 Fax # 919-733-0513

COMMENTS
DRAFT RECORD OF DECISION FOR OPERABLE UNIT #2
SITES 6,9, and 82
MCB CAMP LEJEUNE
JACKSONVILLE, NORTH CAROLINA
Prepared by:
NC SUPERFUND SECTION
August 1993

1) Page D-1

The selected remedy has not been determined. Please note that the NC Superfund Section recommends that the Remedial Action Alternative that fully treats contaminated groundwater be chosen (Refer to NC Superfund comments to the Draft RI/FS and PRAP).

2) Page D-2

Discharge of treated groundwater should include other methods. Please note that the NC Superfund Section has indicated in response to the Draft RI/FS and Draft PRAP that alternative methods for discharge of treated groundwater, such as leaching beds, irrigation, land application, should be considered, in addition to direct discharge to Wallace Creek. The NC DEM is concerned that a continuous discharge of a high volume of freshwater could adversely affect Wallace Creek.

3) Page 14-17 Summary of Site Risks

This section must be reviewed, and revised as necessary, after EPA and NC Superfund Section comments to the Draft RI/FS Risk Assessment are addressed.

4) Page 15

Although VOCs are not identified as COCs in surface soils, they are present and should be identified.

5) Page 18,9; Table 2,3

Please revise these tables, as necessary, after US EPA and NC Superfund Section comments to the Draft RI/FS Risk Assessment have been addressed.

COMMENTS
DRAFT PROPOSED REMEDIAL ACTION FOR OPERABLE UNIT #2
Sites 6, 9, and 82
MCB CAMP LEJEUNE

1) Page 14-17, Summary of Site Risks

This section must be reviewed, and revised as necessary, after EPA and NC Superfund Section comments to the Draft RI/FS, Risk Assessment, are addressed.

2) Page 15

Although VOCs are not identified as COCs in surface soils, they are present and should be identified.

3) Page 20 and 21

These pages refer to Time Critical Removal Action (TCRA). Please provide a brief description of a TCRA.

4) Page 23

The Groundwater Treatment Alternatives call for discharge of treated groundwater to Wallace Creek. The NC Superfund Section discussed this with the NC Wilmington Region and determined that different methods of treated groundwater should be investigated. The actual discharge method of treated groundwater should be one that is determined to be the least detrimental to the environment and could include the following or any combination thereof; direct discharge, land application, leaching beds, etc. The NC DEM is concerned that continuous discharge of a high volume of fresh water could adversely effect Wallace Creek.

5) Page 30, Evaluation of Alternative and the Preferred Alternative

The proposed alternative identifies Remedial Action Alternative (RAA) #4 to treat groundwater. As indicated in our comments to the Draft FS, the NC Groundwater Section recommends RAA#5, which provides for complete groundwater treatment. The NC Administrative Code 15A, Subchapter 2L Section .0106, Corrective Action, part (a) states the following.

"The goal of actions taken to restore groundwater quality shall be restoration to the level of the standards, or as close thereto as is economically and technologically feasible".

RAA #4 recommends partial treatment of the contaminated groundwater and; therefore, the NC DEM Groundwater Section cannot support this recommendation.

Comments
Page 2

6) Page 43

The state has not concurred, at this time, with Remedial Action Alternative (RAA) #4. As noted in the response to the Draft RI/FS and Draft PRAP, the state recommends RAA #5.

7) Page 46, Selected Remedy

Same comment as above.